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September 10, 2014

VIA ELECTRONIC MAIL
captioningexemption@fcc.gov

E. Elaine Gardner
Attorney, Disability Rights Office
Consumer and Governmental Affairs Bureau
Federal Communications Commission

Re: CGB –CC-1338, CG Docket No. 06-181
Supplement to Petition for Exemption from Closed Captioning
Requirements Pursuant to 49 C.F.R. § 79.1(f)

Dear Ms. Gardner:

We are in receipt of your correspondence dated July 11, 2014 (the "FCC Letter") sent on behalf of the Federal Communications Commission (the "FCC") to Port of Faith Chapel Inc. d/b/a Horizon Church f/d/b/a International Christian Centre ("Port of Faith Chapel" or the "Church"). The FCC Letter requested supplemental information in connection with the petition (the "Petition") Port of Faith Chapel submitted on May 2, 2014 pursuant to 49 C.F.R. § 79.1(f) requesting an "economically burdensome" exemption to the closed captioning requirements for its weekly television program "Hope and Healing with Jerry Barnard" (the "Program"). We submit this letter to supplement the Petition to provide the additional information requested in the FCC Letter.

I. Annual Cost of Purchasing and Maintaining the Closed Captioning Equipment and of Hiring Personnel to Operate the Equipment

First, the FCC Letter requested that the FCC be provided with an annual cost of hiring personnel and maintaining equipment. As set forth in the Petition, in May of 2014, Port of Faith Chapel researched the cost of purchasing the equipment to produce the closed captioning on its own. Port of Faith Chapel learned that purchasing the equipment would likely cost between \$4,000.00 and \$8,000.00 and that hiring a part time individual with technical skills to operate the equipment would cost between \$300.00 and \$500.00 per week. The Program airs fifty (50) weeks each year. Consequently, the cost to purchase the equipment to produce closed captions and to hire personnel to operate such equipment for the first year would range between \$19,000.00 and \$33,000.00. After the first year, the annual cost of hiring personnel to operate the equipment

to produce the closed captions would range between \$15,000.00 and \$25,000.00 per year. Even at the lowest end of the ranges, and without even factoring in the cost of maintaining the equipment, purchasing the closed captioning equipment and hiring personnel to operate it would be economically burdensome (if not cost-prohibitive) for the Church.

II. Discrepancies Between the Profit & Loss Statements and the Balance Sheets

The FCC Letter stated that although the net income (loss) reported in the Profit & Loss Statements should be identical to the amount reported in the equity section of the Balance Sheets, Port of Faith Chapel reported a net loss in the Profit & Loss Statement and net income in the equity section of the Balance Sheet for each of the years 2012 and 2013. The FCC Letter asks for Port of Faith Chapel to explain or correct the differences between the Profit and Loss Statements and the Balance Sheets.

Please find enclosed revised Profit & Loss Statements and Balance Sheets for the years 2012 and 2013 (collectively, the "Revised Financial Statements"). In each revised Profit & Loss Statement, the amount reported for net income is identical to the amount reported in the equity section of the corresponding revised Balance Sheet. Although the Revised Financial Statements indicate a small net income amount for both 2012 and 2013, any such net income was applied toward reduction of the debt owed by the Church to America's Christian Credit Union.

III. Metro Church of San Diego Loan

The FCC Letter also states that Port of Faith Chapel reported a loan of \$24,949.21 from Metro Church in San Diego in current assets in both 2012 and 2013. The FCC Letter asked Port of Faith Chapel to clarify if this is in fact a current asset, and whether it could be converted into cash within twelve months.

The Metro Church loan was mistakenly left on the 2012 and 2013 Balance Sheets that were submitted with the original Petition as a current asset when it in fact it was no longer a current asset. The Metro Church loan has been removed from the enclosed revised Balance Sheets.

Port of Faith Chapel reiterates its regret that it does not have the financial means to provide closed captioning in connection with the Program and that it is unable to reach the viewers that would benefit from the closed captioning.

To the extent you need any additional information to evaluate this Petition, please do not hesitate to contact the undersigned.

Sincerely,

A handwritten signature in blue ink, reading "Lane Elizabeth Begy Roesch". The signature is written in a cursive style with a large initial "L".

Lane Elizabeth Begy Roesch

LEBR/lebr
Enclosures
cc: Gerald Barnard